

## **REMARKS**

This paper is submitted in response to the Final Office Action dated January 23, 2007. In addition, Applicant respectfully requests that a two-month extension of time be granted to respond to the Office Action mailed January 23, 2007, and that the Examiner consider this a petition therefor. The period of response therefore extends up to and includes June 25, 2007 (since June 23, 2007 is a Saturday), and this paper is timely filed. Authorization for a Credit Card charge of \$225.00 for the two-month extension fee based upon Applicant's small entity status is hereby included in the Electronic Fee Sheet attached. Reconsideration and allowance of all pending claims by the Examiner are therefore respectfully requested.

In the subject Office Action, claims 26-27, 30, 48, 61, 68-70 and 75 were rejected under 35 U.S.C. § 101. Furthermore, claims 14-19, 20-25, 39-41, 44, 55-59 and 67 were rejected under 35 U.S.C. § 112, first paragraph; and claim 62 was rejected under 35 U.S.C. § 112, second paragraph. Moreover, claims 1-2, 5, 27, 42 and 65 were rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 4,677,493 to Shinya (Shinya), and claim 46 was rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,748,330 to Wang (Wang). In addition, claims 3 and 30 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Shinya in view of U.S. Patent No. 5,696,604 to Curry (Curry); claim 4 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Shinya in view of Curry and U.S. Patent No. 5,982,989 to Broddin (Broddin); claims 7, 14, 19, 33-37, 39-41, 44, 50, 52, 54-55, 58, 67 and 73 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Shinya in view of U.S. Patent No. 5,828,463 to Delabastita (Delabastita); claims 8-9, 12, 43, 60, 62, 64, 68-69 and 75 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Shinya in view of U.S. Patent No. 5,729,632 to Tai (Tai); claims 10, 63 and 70 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Shinya in view of Tai and Curry; claim 11 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Shinya in view of Tai, Curry, Broddin and U.S. Patent No. 5,627, 919 to Kemmochi (Kemmochi); claim 13 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Shinya in view of Tai and Delabastita; claims 15, 20-22, 24-25 and 74 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Shinya in view of Delabastita and Curry; claim 16 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Shinya in view of Delabastita, Curry, Broddin and Kemmochi; claims 17-18 were rejected under 35 U.S.C.

§ 103(a) as being unpatentable over Shinya in view of Delabastita and Tai; claim 23 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Shinya in view of Delabastita, Curry and Broddin; claim 26 was rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,631,748 to Harrington (Harrington) in view of U.S. Patent No. 4,196,451 to Pellar (Pellar); claims 45, 48, 61 and 71 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Harrington in view of Tai; claim 47 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Wang in view of Tai; claims 51 and 56-57 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Shinya in view of Delabastita and Tai; claims 53 and 59 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Shinya in view of Delabastita and Kemmochi; claim 66 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Shinya in view of Kemmochi; and claim 72 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Harrington in view of Tai and Delabastita.

Applicant respectfully traverses the Examiner's rejections to the extent that they are maintained. Nonetheless, Applicant has canceled claims 58 and 72, and amended claims 14-27, 30, 39-41, 44, 48, 55-59, 62, 67, 68 and 75. Applicant respectfully requests that the Examiner enter these amendments on the record pursuant to 37 C.F.R. 1.116(a), as the amendments do not raise any new issues, and merely incorporate subject matter to overcome the prior art of record.

As an initial matter, Applicant wishes to thank the Examiner for the courtesy extended in the personal interview between the Examiner and Applicant's representative. In the interview, proposed amendments to the claims to address the art-based rejections were discussed, mainly as they concerned primary reference, Shinya. During the interview, the Examiner considered that Shinya is not directed to halftone dots, as claimed. Rather, Shinya discloses pixel elements (col. 1, lines 24-29; col. 2, line 33; col. 5, lines 49-54 and col. 7, lines 49-58). Examiner graciously suggested that Applicant submit the present after-final response, and in so doing, to formally have the absence in Shinya of halftone dots reconsidered. Applicants now respectfully request that all of the rejections based on Shinya be withdrawn, as Shinya does not disclose, motivate, suggest the claimed halftone embodiments.

Applicant has amended the claims rejected on §101 and §112 grounds. Applicant believes the claims now meet all statutory requirements. Withdrawal of the §101 and §112 rejections are therefore respectfully requested.

As for the remaining claims rejected based on the (non-Shinya) prior art, claim 26 discloses a non-obvious fold function that is mathematically unique to the prior art. Applicant respectfully submits that it is this novel and non-obvious manipulation of printer program language, i.e., within the confines of PostScript/raster scanner program code rules/conventions, that enable the unique halftone dots of the claimed embodiments. The prior art no more suggests the claimed function than does it suggest the claimed halftone dot features enabled by the claimed function. Applicant requests that this rejection be withdrawn.

As for claims 45, 48, 61 and 71, Applicants urge the Examiner to consider that Tai (as with the other cited art) fails to disclose a plurality of line frequencies at a single threshold value. The cited portions of Tai at best refer to separate threshold values combined onto a single printing surface. That is, Tai combines different screens to create frequency affects (col. 8, lines 18-20 col. 10, lines 7-10 and col. 5, lines 45-48) . Regarding claim 47, neither prior art reference discloses or suggests dissimilar dots within the same halftone cell of the same halftone screen at the same threshold value. Reconsideration and allowance of claims 45, 47, 48, 61 and 71 are therefore respectfully requested.

In summary, Applicant respectfully submits that all pending claims are novel and non-obvious over the prior art of record. Reconsideration and allowance of all pending claims are therefore respectfully requested. If the Examiner has any questions regarding the foregoing, or which might otherwise further this case onto allowance, the Examiner may contact the undersigned at (513) 241-2324. Moreover, if any other charges or credits are necessary to complete this communication, please apply them to Deposit Account 23-3000.

Respectfully submitted,

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Date

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